

Supreme Court Cause No. 85260-0 Court of Appeals Cause No. 39265-8-II

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

CHRISTA ALBICE, a married woman, and BART A. TECCA and KAREN L. TECCA, husband and wife, Respondents,

VS.

PREMIER MORTGAGE SERVICES OF WASHINGTON, INE, a Washington Corp.; OPTION ONE MORTGAGE CORPORATION, a California Corporation;
Defendants,

RON DICKINSON and "JANE DOE" DICKINSON, husband and wife, Petitioners,

ON APPEAL FROM THE COURT OF APPEALS, DIVISION II

REPLY TO RESPONSE TO PETITION FOR REVIEW

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The Response to the Petition for Review asks the Supreme Court to

review an issue not raised in the Petition for Review and not decided by the

Court of Appeals. At trial, Ms. Albice and the Teccas ("Albice/Tecca")

contended that the Trustee, Premier Mortgage Services of Washington, Inc.

("Premier"), did not have at least one officer who was a Washington

resident. As a consequence, pursuant to RCW 61.24.010(a), Albice/Tecca

argues, Premier was not a qualified trustee and the sale was also void on that

basis.

Petitioners Dickinson ("Dickinsons") would urge that the trial

court's ruling is supported by substantial evidence and should not be

disturbed on appeal. Moreover, the Dickinsons urge that the trial court's

decision in that aspect of the case does not meet any of the considerations

governing this Court's acceptance of review set forth at RAP 13.4(b).

Nevertheless, if the Supreme Court accepts review, the Dickinsons

agree that the issue should be resolved by this Court in the interests of

judicial economy.

Respectfully submitted this 23 day of December, 2010.

DITLEVSON-RODGERS DIXON, P.S.

By:

Richard L. Ditlevson, WSB # 735

Attorney for Petitioners